

SAO

WRIGHT, FINLAY & ZAK, LLP

Darren T. Brenner, Esq.

Nevada Bar No. 8386

Stephanie A. Garabedian, Esq.

Nevada Bar No. 9612

7785 W. Sahara Ave., Suite 200

Las Vegas, NV 89117

(949) 477-5050; Fax: (702) 946-1345

dbrenner@wrightlegal.net

sgarabedian@wrightlegal.net

Attorneys for Defendant, Hartford Insurance Company of the Midwest

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

IVO HURVITZ, individually,

Plaintiff,

vs.

HARTFORD INSURANCE COMPANY OF
THE MIDWEST, and DOES I through X
inclusive, ROE CORPORATIONS I through
X, inclusive,

Defendants.

Case No.: 2:22-cv-00738-JAD-VCF

**STIPULATION AND ORDER TO
EXTEND DISCOVERY**

(Second Request)

Ivo Hurvitz (**Plaintiff**), and Defendant, Hartford Insurance Company of the Midwest (**Hartford**), (collectively, the **Parties**), by and through their counsel of record, hereby submit their Stipulation to Extend Discovery by ninety-one (91) days in accordance with Local Rule 26-3 and Local Rule IA 6-1.

This is the Parties second request for an extension of time to the current discovery plan and counsel submits that the request is brought in good faith, supported by good cause in compliance with LR 26-3, and is not intended to cause delay.

A. Statement Specifying the Discovery Completed:

Hartford submitted its proposed Discovery Plan on July 11, 2023 [ECF No. 15]. The Scheduling Order was subsequently entered on July 13, 2023 [ECF No. 19]. The 702 Firm Injury Attorneys made their initial appearance as counsel for Plaintiff on August 4, 2023 [ECF No. 22].

To date, the Parties have completed the following discovery:

- Hartford's First Set of Requests for Admissions to Plaintiff were served on July 14, 2023;
- Hartford's First Set of Requests for Production of Documents to Plaintiff were served on July 14, 2023;
- Hartford's First Set of Interrogatories to Plaintiff were served on July 14, 2023;
- Hartford's Initial Disclosure of Witnesses and Documents was served on July 18, 2023;
- Plaintiff's Initial Disclosure of Witnesses and Documents was served on August 4, 2023;
- Plaintiff's Responses to Hartford's First Set of Requests for Admissions were served on September 13, 2023;
- Plaintiff's Responses to Hartford's First Set of Interrogatories were served on September 13, 2023;
- Plaintiff's First Supplemental Disclosure of Witnesses and Documents was served on September 18, 2023;
- Plaintiff's Responses to Hartford's First Set of Requests for Production of Documents were served on September 18, 2023;
- Hartford noticed the deposition of Plaintiff on October 24, 2023;
- Plaintiff's First Set of Requests for Admissions to Hartford were served on October 31, 2023;
- Plaintiff's First Set of Requests for Production of Documents to Hartford were served on October 31, 2023; and
- Plaintiff's First Set of Interrogatories to Hartford were served on October 31, 2023.

B. Specific Description of the Discovery that Remains to be Completed:

The Parties need to conduct the following discovery:

- Hartford will take the deposition of Plaintiff;
- Hartford will respond to the written discovery propounded by Plaintiff;
- Plaintiff will take the deposition of the Fed. R. Civ. P. 30(b)(6) Witness(es) for Hartford;
- The Parties' Initial Expert Disclosures;
- The Parties' Rebuttal Expert Disclosures;
- Deposition of various fact witnesses and experts; and
- Such other discovery that may be deemed necessary or appropriate.

C. The Reasons why the Deadline was not Satisfied or the Remaining Discovery was not Completed Within the Time Limits set by the Discovery Plan:

The Parties have been diligent in conducting discovery since discovery commenced in this matter. However, the Parties have found that more time is needed to coordinate the depositions of Plaintiff and the Defendant's F.R.C.P. 30 (b)(6) witness, which is expected to cause delays in identifying the necessary experts and the retention and depositions of said experts. As such, the Parties request a brief ninety-one day extension.

D. A proposed schedule for completing all remaining discovery.

The Parties request that the current deadlines in the Scheduling Order [ECF No. 19] be extended as follows:

Phase I: Discovery directed at breach of contract claims

1. Last Day to Disclose Initial Expert Reports: currently January 22, 2024, **desired April 19, 2024;**
2. Last Day to Disclose Rebuttal Experts: currently February 20, 2024, **desired May 20, 2024;** and
3. Last Day to Complete Discovery: currently March 21, 2024; **desired June 20, 2024.**

Phase II: Discovery directed at Plaintiff's alleged damages

1. Last Day to Amend Pleadings or Add Parties: currently May 6, 2024; **desired August 6, 2024;**
2. Last Day to Disclose Initial Expert Reports: currently June 6, 2024, **desired September 5 2024;**
3. Last Day to Disclose Rebuttal Experts: currently July 5, 2024, **desired October 7, 2024;**
4. Last Day to Complete Discovery: currently August 5, 2024; **desired November 4, 2024;**
5. Last Day to File Dispositive Motions: currently September 3, 2024, **desired December 4, 2024;** and
6. Last Day to File Joint Pre-Trial Order: currently October 3, 2024, **desired January 3, 2025.** In the event dispositive motions are filed, the date for filing the joint pretrial order shall be suspended until thirty (30) days after a decision of the dispositive motions. The disclosures required by FRCP 26(a)(3), and any objections thereto, shall be included in the pretrial order.

IT IS SO STIPULATED.

DATED this 30th day of November, 2023.

DATED this 30th day of November, 2023.

THE702FIRM INJURY ATTORNEYS

WRIGHT, FINLAY & ZAK, LLP

/s/ Michael C. Kane

/s/ Stephanie A. Garabedian

Michael C. Kane, Esq.
Nevada Bar No. 10096
8335 W. Flamingo Road
Las Vegas, Nevada 89147
Attorneys for Plaintiff, Ivo Hurvitz

Stephanie A. Garabedian, Esq.
Nevada Bar No. 9612
7785 W. Sahara Ave., Suite 200
Las Vegas, NV 89117
Attorneys for Defendant, Hartford Insurance Company of the Midwest

IT IS SO ORDERED.

Dated this 1st day of December, 2023.


UNITED STATES MAGISTRATE JUDGE